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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

SUSAN GUERRINI, : Civil Action No. 13-cv-3974 (PGS)(DEA)

Plaintiff, : (Filed Electronically)

v. : CERTIFICATION OF

: **DEPUTY ATTORNEY GENERAL**THE COLLEGE OF NEW JERSEY, : **TIMOTHY R. OBERLEITON**

Defendant.

- I, Timothy R. Oberleiton, of full age, hereby certify and state:
- 1. I am an attorney licensed to practice law in the State of New Jersey and before this Court. I am the Deputy Attorney General assigned to represent Defendant The College of New Jersey ("TCNJ" or "Defendant") in the above-captioned matter. As such, I am familiar with the facts set forth below.
 - 2. The exhibits listed below are true and accurate copies of the following documents:

Exhibit A Plaintiff's Response to Defendant's Statement of Allegedly

Undisputed Material Facts

Exhibit B TCNJ Promotion and Reappointment Document (Bates No. TCNJ

Zamon C	dated May 12, 2011 (Bates No. PROVOST FILE 012-015).
Exhibit D	Letter from Provost Bresnahan to Plaintiff Recommending Non-reappointment dated June 10, 2011 (Bates No. DEAN FILE 074).
Exhibit E	Letter from President Gitenstein Concurring with Provost Recommendation for Non-reappointment dated June 30, 2011 (Bates No. DEAN FILE 076).
Exhibit F	EEO/AA Investigation Report dated February 13, 2012. (Bates No. EEO FILE 1-7).
Exhibit G	Final Determination Letter from TCNJ dated February 14, 2012. (Bates No. EEO FILE 58-59).
Exhibit H	Appeal by Susan C. Guerrini, Ph.D. dated March 5, 2012 (Bates No.

Exhibit I Final Administrative Action of the Civil Service Commission: In the

matter of Susan Guerrini, The College of New Jersey, CSC Docket

Letter from Dean Laughton Recommending Non-reappointment

No. 2012-2685 (Bates No. EEO FILE 66-71)

Exhibit J Relevant portions of the Deposition Transcript of Plaintiff Susan

Guerrini dated May 2, 2014

GUERRINI 1907-1910

Exhibit K Relevant portions of the Joint Final Pretrial Order entered by this

Court on May 31, 2016 (ECF No. 43)

Exhibit L Opinion of the Superior Court of New Jersey, Appellate Division in

Rasmussen v. Vineland Bd. of Educ., No. A-0038-13T3, 2014 N.J.

Super. Unpub. LEXIS 2929 (App. Div. Dec. 22, 2014)

1. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Timothy R. Oberleiton

Timothy R. Oberleiton Deputy Attorney General

Dated: June 23, 2016

Exhibit C